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July 26, 2021

VIA ECF

Hon. Alison J. Nathan
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Manjarrez v. Bayard's Ale House LLC et al.
Case No.: 21-cv-1968 (AJN)

Dear Judge Nathan:

We represent Plaintiff in this matter. We respectfully request that the Court adjourn for two weeks the deadline for Plaintiff to file a motion for conditional certification of a collective action under the FLSA. Defendants consent to this request. The current deadlines are as follows:

1. Opening motion due on 7/28/2021;
2. Opposition due on 8/23/2021; and
3. Reply due on 8/30/2021.

The new deadlines would be:

1. Opening motion due on 8/11/2021;
2. Opposition due on 9/9/2021; and
3. Reply due on 9/16/2021.

SO ORDERED.

7/26/2021

The reason for the request is that Defendants have provided payroll records for Plaintiff, and the parties are engaged in settlement discussions to resolve this matter, which would obviously obviate the need for the motion. We therefore respectfully request that the Court adjourn the deadlines as requested above.

Thank you for your attention to the above.

Respectfully Submitted,

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Michael Taubenfeld